

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Norfolk

UNITED STATES OF AMERICA

v.

Case No. 2:24cr103

STACEY STOREY

STACEY STOREY MOTION FOR TRAVEL FUNDS

COMES NOW the defendant, Stacey Storey, by and through court-appointed counsel, and moves this Honorable Court to enter an order, pursuant to 18 USC 4285, directing the Office of the United States Marshall to provide funds for Stacey Storey's travel expenses from her residence in Clanton, Alabama, to the United States District Court for the Eastern District of Virginia, Norfolk Division. The travel expenses shall include a roundtrip ticket from Clanton Alabama to Norfolk, Virginia and back; money for travel to and from her home to the airport and back; money to and from the airport to the United States District Court in Norfolk and back, money for subsistence; and hotel expenses, including travel expenses to and from the courthouse from the hotel and back, if her travel includes an overnight stay at a hotel. In support of this motion, counsel hereby states as follows:

1. Stacey Storey has been declared to be indigent by this Court.
2. Stacey Storey is scheduled to appear at a plea and initial hearing pursuant to a negotiated plea agreement. The hearings are scheduled for January 30, 2025 at 11:30 a.m. and 2:30 p.m. in the United States District Court for the Eastern District of Virginia, Norfolk Division.
3. Stacey Storey does not possess the necessary funds to travel to Norfolk, Virginia as she lives in a trailer and is currently working parttime at Walmart. She shares a vehicle with

her mother to get to and from work because she cannot afford a car. She takes care of her adult son who is disabled and unable to work.

4. Stacey Storey currently resides in Clanton, Alabama. Her address and telephone number will be provided directly to the Office of the U.S. Marshall by her counsel.

RESPECTFULLY SUBMITTED,

STACEY STOREY

/s/

Kim M. Crump, Esq.
VSB No. 26320
Attorney for **Stacey Storey**
440 Monticello Avenue, Suite 1873
Norfolk, VA 23510
Phone (757)455-8370
Fax: (757)687-0702
attykimcrump@aol.com

Certificate of Service

I hereby certify that, on the 20th day of December 2024, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send a notification of such filing (NEF) to all counsel of record.

STACEY STOREY

/s/

Kim M. Crump, Esq.

VSB No. 26320

Attorney for **STACEY STOREY**

440 Monticello Avenue, Suite 1873

Norfolk, VA 23510

Phone (757)455-8370

Fax: (757)687-0702

attykimcrump@aol.com